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Pete,

### **Rebuttal of RSPB attempted-justifications**

I had presumed that those at the RSPB responsible for the publication of the 'Help us keep Abernethy special' appeal-page were intelligent-enough and reasonable-enough that, on being challenged about the language of their appeal-page, would immediately understand and accept that a reader might misunderstand what the actual condition of Abernethy Forest is and the RSPB intentions towards it.

I had presumed that the language of the appeal-page was so self-evidently misleading, inaccurate, ambiguous, exaggerated, and omissive that I did not need to spell-them-out.

I am genuinely surprised that the RSPB rejected my complaint and by their weak attempts to justify the language of their appeal-page ; the following is a spelled-out, point-by-point rebuttal.

### **The Old Caledonian Forest at Abernethy**

The most important facts about the Old Caledonian Forest at Abernethy that one must understand are that :

1. It is well-established fact that - by definition - the trees of the Old Caledonian Forest are descended from the first trees to arrive in an area after the last ice age more than 11,000 years ago. The often-quoted phrase : 'descended from one generation to the next by natural means' comes from the well-established and highly-regarded *Steven and Carlisle (1959)*
2. Maintaining 'too many' red deer would be the most significant (if not the only) external pressure preventing natural regeneration of the Old Caledonian Forest at Abernethy Forest
3. That the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion in Abernethy Forest. As a result of the RSPB actions the (already evident) natural-regeneration and natural-expansion of the Old Caledonian Forest at Abernethy is impressive

### **Surviving : (1) *continue to exist* (2) *continue to exist in spite of some external pressure***

While it is true that 'surviving' does mean *continue to exist*, it is more typically taken to mean *continue to exist in spite of some external pressure*. The RSPB attempted justification for the use of 'surviving' is a weak one - clearly the forest exists.

*mislead* : to cause (someone) to have a wrong idea

Since the use of 'surviving' is more typically taken to mean *continue to exist in spite of some external pressure* (rather than *continue to exist*) the RSPB use of 'surviving' is *clearly likely* to cause the reader to have a wrong idea - to infer that the existence of the forest is threatened by an external pressure (beyond the control of the RSPB) and that immediate action is necessary.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion ; the RSPB claim that the forest is 'surviving', without mentioning that fact, is *misleading*.

*accurate* : correct in all details

Since the use of 'surviving' is more typically taken to mean *continue to exist in spite of some external pressure* (rather than *continue to exist*) and since those at the RSPB responsible for the publication of their appeal-page must be intelligent and educated enough to know that the reader was *clearly likely* to infer the (Sense 2) meaning ; the RSPB use of 'surviving' is not *correct in all details*.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion ; the RSPB claim that the forest is 'surviving', without mentioning that fact, is *not accurate*.

*ambiguous* : of being open to more than one interpretation

Since 'surviving' may mean *continue to exist* or *continue to exist in spite of some external pressure* the RSPB use of 'surviving' is *open to more than one interpretation* ; the RSPB claim that the forest is 'surviving' is *ambiguous*.

*exaggerate* : to represent something as better or worse than it really is

Since the use of 'surviving' is more typically taken to mean *continue to exist in spite of some external pressure* (rather than *continue to exist*) it is *clearly likely* that the reader will believe that the condition of the forest is worse than it really is.

Since those at the RSPB responsible for the publication of their appeal-page must be intelligent and educated enough to know that the reader was *clearly likely* to infer the (Sense 2) meaning the RSPB use of 'surviving' is *exaggerated* (by implied-inference).

*omission* : something has been left out

On their appeal-page, all reference to the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion *has been left out*.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion ; the RSPB claim that the forest is 'surviving', without mentioning that fact, is *omissive*.

*Ageing : (of a person) growing old*

'ageing' is an anthropocentric term and implies that the subject-person is nearing the end of their lifetime ; forests do not have lifetimes in the sense that people do.

If a forest were overgrazed to the extent that the survival-rate of seedlings was lower than the death-rate of older trees, and the average age of its trees was rising, then (at a stretch) it may be said that the forest was 'ageing', but the RSPB do not reference any evidence that the average age of the trees is rising.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion in Abernethy Forest.

It is a fact that there are many seedlings in Abernethy Forest no more than one or two years old. The impressive rate of natural regeneration might be lowering the average age of the trees in the forest ; hence it might well be the case that the forest is growing younger.

*mislead* : to cause (someone) to have a wrong idea

The RSPB use of 'ageing' is *clearly likely* to cause the reader to have a wrong idea - to infer that the forest has a lifetime and is approaching the end of it.

Forests do not have lifetimes in the sense that people do ; the RSPB claim that the forest is 'ageing' is *misleading*.

*accurate* : correct in all details

Without evidence there is only speculation and opinion ; without evidence it is *not correct* to claim that the forest is 'ageing'.

Assertion without evidence is not fact ; the RSPB claim that the forest is 'ageing' is *not accurate*.

*ambiguous* : (2) not having one obvious meaning

The RSPB use of 'ageing' is *clearly likely* to cause the reader some confusion ; in this context 'ageing' has no *obvious meaning* ; the RSPB claim that the forest is 'ageing' is *ambiguous*.

*exaggerate* : to represent something as better or worse than it really is

The RSPB use of 'ageing' is *clearly likely* to cause the reader to infer that the condition of the forest is *worse than it really is* ; the RSPB claim that the forest is 'ageing' is *exaggeration*.

*omission* : something has been left out

On their appeal-page, any reference to evidence that the average age of the trees is rising and all mention of their actions to reduce red deer numbers and the resultant natural regeneration *has been left out*.

Without evidence it is impossible to know if the average age of the trees is rising ; the RSPB claim that the forest is 'ageing', without referencing evidence or mentioning their actions, is *omissive*.

### Fragmented : *to be in pieces*

On their appeal-page, the RSPB do not reference any evidence to support their assertion that the forest is 'fragmented'.

The RSPB attempted justification for the use of 'fragmented' is a weak one - clearly the JNCC statement refers to the Old Caledonian Forest generally (across the whole of Scotland) not Abernethy Forest specifically. In referring to the JNCC statement the RSPB are clearly *clutching at pine-needles* in an attempt to justify their interventionist tree planting. Indeed, it appears that the RSPB cannot even agree among themselves whether the remnant Old Caledonian Forest at Abernethy is *in pieces* or not ; in his blog in 2013 Martin Harper, RSPB Conservation Director, wrote :

Abernethy National Nature Reserve includes the UK's largest remnant of Caledonian forest - 50 square km of pinewoods stretch from the River Spey to the foot of the vast Cairngorm Mountains

I take Martin Harper's use of the singular 'remnant' as intentional - that he is intelligent and educated enough to use the precise form of the words to say what he means ; that the remnant of the Old Caledonian Forest at Abernethy is a single block of woodland stretching from the River Spey to the Cairngorms.

Natural regeneration is annually reducing the openness and expanding the area of the forest - it is already expanding southwards into Strath Nethy beyond Bynack Stables (site of).

*mislead* : to cause (someone) to have a wrong idea

Like any open woodland, the canopy of the remnant Old Caledonian Forest at Abernethy is not continuous, but the forest is not 'fragmented' in any meaningful sense.

The RSPB use of 'fragmented' is *clearly likely* to cause the reader to have a wrong idea - to infer that the Old Caledonian Forest at Abernethy is in scattered pieces separated by significant gaps ; the RSPB claim that the forest is 'fragmented' is *misleading*.

*accurate* : correct in all details

Without evidence there is only speculation and opinion ; without evidence it is *not correct* to claim that the forest is 'fragmented'.

Assertion without evidence is not fact ; the RSPB claim that the forest is 'fragmented' is *not accurate*.

*exaggerate* : to represent something as better or worse than it really is

The RSPB use of 'fragmented' is *clearly likely* to cause the reader to infer that the condition of the forest is *worse than it really is* ; the RSPB claim that the forest is 'fragmented' is *exaggeration*.

*omission* : something has been left out

On their appeal-page, any reference to their actions to reduce red deer numbers and the resultant natural regeneration *has been left out*.

Without evidence it is impossible to know if the forest is 'fragmented' or not ; the RSPB claim that the forest is 'fragmented', without referencing evidence or mentioning their actions, is *omissive*.

*Struggling* : to make forceful efforts to get free

'struggling' is an anthropocentric term and implies that the subject-person is being prevented from doing something by some external pressure and must *make forceful efforts to get free* ; forests cannot be prevented from doing something in the sense that people can, nor can they *make forceful efforts to get free*.

If a forest were overgrazed to the extent that the survival-rate of seedlings was lower than the death-rate of older trees, and the average age of its trees was rising, then (at a stretch) it may be said that the

forest was 'struggling', but the RSPB do not reference any evidence that the forest is being prevented from naturally-regenerating and naturally-expanding.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion in Abernethy Forest.

It is a fact that Abernethy Forest is littered with naturally sown seedlings of all ages ; in no meaningful sense is the forest being prevented from naturally-regenerating and naturally-expanding.

*mislead* : to cause (someone) to have a wrong idea

The RSPB use of 'struggling' is *clearly likely* to cause the reader to have a wrong idea - to infer that the Old Caledonian Forest at Abernethy is being prevented from naturally-regenerating and naturally-expanding by an unspecified external pressure ; the RSPB claim that the forest is 'struggling' is *misleading*.

*accurate* : correct in all details

Without evidence there is only speculation and opinion ; without evidence it is *not correct* to claim that the forest is 'struggling'.

Assertion without evidence is not fact ; the RSPB claim that the forest is 'struggling' is *not accurate*.

*ambiguous* : (2) not having one obvious meaning

The RSPB use of 'struggling' is *clearly likely* to cause the reader some confusion ; in this context 'struggling' has no *obvious meaning* ; the RSPB claim that the forest is 'struggling' is *ambiguous*.

*exaggerate* : to represent something as better or worse than it really is

The RSPB use of 'struggling' is *clearly likely* to cause the reader to infer that the condition of the forest is *worse than it really is* ; the RSPB claim that the forest is 'struggling' is *exaggeration*.

*omission* : something has been left out

On their appeal-page, any reference to their actions to reduce red deer numbers and the resultant natural regeneration *has been left out*.

Without evidence it is impossible to know if the forest is 'struggling' or not ; the RSPB claim that the forest is 'struggling', without referencing evidence or mentioning their actions, is *omissive*.

### Under their own terms : *the freedom to set conditions*

'under their own terms' is an anthropocentric expression and implies that the subject-person *can* or has *the freedom to set the conditions* under which they will do something ; forests cannot *set conditions* in the sense that people can.

It is a fact that the RSPB actions have significantly reduced (if not effectively eliminated) the impact of red deer on natural-regeneration and natural-expansion in Abernethy Forest ; this will continue without any intervention from the RSPB.

The RSPB attempt to justify the use of 'under their own terms' is weak and false. The RSPB are clearly *clutching at pine-needles* in an attempt to justify their interventionist tree planting.

*mislead* : to cause (someone) to have a wrong idea

The RSPB use of 'under their own terms' is *clearly likely* to cause the reader to have a wrong idea - to infer that their interventionist tree planting complements natural-regeneration ; the RSPB claim that trees will be growing back 'under their own terms' is *misleading*.

*accurate* : correct in all details

The RSPB assertion that they are 'encouraging natural regeneration' is oxymoronic - while interventionist tree planting continues it is *not correct* to claim that trees will be 'grow[ing] back under their own terms'.

This 'encouragement' is interventionist tree planting and is incompatible with natural regeneration ; the RSPB claim that trees will grow back 'under their own terms' is *not accurate*.

*ambiguous* : (2) not having one obvious meaning

'under their own terms' is an anthropocentric expression and implies that the subject-person has the freedom to set the conditions under which they will do something.

The RSPB use of 'under their own terms' is *clearly likely* to cause the reader some confusion ; in this context 'under their own terms' has no *obvious meaning* ; the RSPB claim that trees will grow back 'under their own terms' is *ambiguous*.

*omission* : something has been left out

By juxtaposing 'planting trees by the thousand' and 'trees to grow back under their own terms' the RSPB are conflating contradictory intervention with non-intervention. This is likely to cause the reader to infer that tree planting (intervention) and natural regeneration (non-intervention) are equivalent.

On their appeal-page, any reference to their actions to reduce red deer numbers and the resultant natural regeneration *has been left out*.

It is a fact that tree planting (intervention) and natural regeneration (non-intervention) are not equivalent ; the RSPB claim that trees will grow back 'under their own terms', without mentioning this fact, is *omissive*.

### seedlings can't fight through the thick cover of heather

The operative words here are *can't* and *fight* - *can't* is an absolute term meaning that something cannot happen ; that it is impossible - *fight* is an anthropocentric expression and implies that the subject-person has to struggle to overcome something ; seedlings don't struggle in the sense that people do.

The impressive rate of natural regeneration at Abernethy Forest is self-evident proof that seeds can get to the ground through thick heather and that seedlings can grow up through thick heather.

*mislead* : to cause (someone) to have a wrong idea

The RSPB use of *can't* is *clearly likely* to cause the reader to have a wrong idea - to infer that it is impossible for seedlings to grow through thick heather.

The impressive rate of natural regeneration at Abernethy Forest is self-evident proof that seedlings can grow through thick heather ; the RSPB claim that 'seedlings can't fight through the thick cover of heather' is *misleading*.

*accurate* : correct in all details

The RSPB assertion that 'seedlings can't fight through the thick cover of heather' is *not correct*.

The impressive rate of natural regeneration at Abernethy Forest is self-evident proof that seedlings can grow through thick heather ; the RSPB claim that 'seedlings can't fight through the thick cover of heather' is *not accurate*.

*ambiguous* : (2) not having one obvious meaning

The RSPB use of 'fight' in this expression is *clearly likely* to cause the reader some confusion ; in this context 'fight' has no *obvious meaning* ; the RSPB claim that 'seedlings can't fight through the thick cover of heather' is *ambiguous*.

*exaggerate* : to represent something as better or worse than it really is

The RSPB use of 'seedlings can't fight through the thick cover of heather' is *clearly likely* to cause the reader to infer that the growing condition for seedlings is *worse than it really is* ; the RSPB claim that 'seedlings can't fight through the thick cover of heather' is *exaggeration*.

*omission* : something has been left out

On their appeal-page, any reference to their actions to reduce red deer numbers and the resultant natural regeneration *has been left out*.

It is a fact that seedlings can and do grow through thick heather ; the RSPB claim that 'seedlings can't fight through the thick cover of heather', without mentioning that fact, is *omissive*.

## help us expand the forest towards the natural tree-line

The operative expressions here are *help us expand* and *natural tree-line* - *help us expand* implies interventionist tree planting - *natural tree-line* implies that the RSPB know where the natural upper-limit of the forest lies.

By juxtaposing *help us expand* and *natural tree-line* the RSPB are conflating contradictory intervention with non-intervention. This is likely to cause the reader to infer that tree planting (intervention) and natural regeneration (non-intervention) are equivalent.

On their appeal-page, there is no reference to where the 'natural tree-line' lies or how the RSPB came to know where it lies.

*mislead* : to cause (someone) to have a wrong idea

'help us expand the forest towards the natural tree-line' is *clearly likely* to cause the reader to have a wrong idea - to infer that the RSPB know where the natural upper-limit of the forest is ; the RSPB claim (by implication) to know where the natural upper-limit of the forest lies is *misleading*.

*accurate* : correct in all details

Without evidence there is only speculation and opinion ; without evidence it is *not correct* to claim (by implication) that they know where the 'natural tree-line' lies.

Assertion without evidence is not fact ; the RSPB claim (by implication) to know where the 'natural tree-line' lies is *not accurate*.

*omission* : something has been left out

On their appeal-page, any reference to where the 'natural tree-line' lies or how the RSPB came to know where it lies *has been left out*.

Without evidence it is impossible to know where the 'natural tree-line' lies ; the RSPB claim (by implication) to know where the 'natural tree-line' lies, without mentioning this impossibility or referencing evidence, is *omissive*.

### help us establish and restore ... Caledonian pine forest

By juxtaposing 'establish' and 'restore' the RSPB are conflating contradictory terms. In this context 'establish and restore' can only mean interventionist tree planting.

It is well established fact that the Old Caledonian Forest cannot be 'established and restored' by planting trees - by definition its trees must be 'descended from one generation to the next by natural means' - a quotation from the well-established and highly-regarded *Steven and Carlisle (1959)*.

The single most important fact that one must understand about the Old Caledonian Forest is that its trees are descended from the first trees to arrive after the last ice age more than 11,000 years ago. By definition - Old Caledonian Forest cannot be established nor restored by planting ; planting can only ever expand the area of planted woodland.

*mislead* : to cause (someone) to have a wrong idea

The RSPB use of 'establish and restore' is *clearly likely* to cause the reader to have a wrong idea - to infer that their tree planting is equivalent to natural regeneration ; the RSPB claim that they can 'establish and restore' the Old Caledonian Forest at Abernethy is *misleading*.

*accurate* : correct in all details

The RSPB assertion that their tree planting can 'establish and restore' the Old Caledonian Forest at Abernethy is *not correct*.

Tree planting can never expand nor restore the Old Caledonian Forest ; the RSPB claim that they can 'establish and restore' the Old Caledonian Forest at Abernethy is *not accurate*.

*ambiguous* : (2) not having one obvious meaning



The RSPB use of 'establish and restore' is *clearly likely* to cause the reader some confusion ; since tree planting can never expand nor restore the Old Caledonian Forest, in this context 'establish and restore' has no *obvious meaning* ; the RSPB claim that they can 'establish and restore' the Old Caledonian Forest at Abernethy is *ambiguous*.

*omission* : something has been left out

On their appeal-page, all reference to the fact that - by definition - trees of the Old Caledonian Forest must be 'descended from one generation to the next by natural means' *has been left out*.

It is well-established fact that natural regeneration is the only 'method' of expanding or restoring Old Caledonian Forest ; the RSPB claim that they can 'establish and restore' the Old Caledonian Forest at Abernethy, without mentioning that well-established fact, is *omissive*.

## Conclusion

For the avoidance of doubt - my complaint is not about natural regeneration, nor is it about whether the RSPB is committed to whatever it is they claim commitment to.

My complaint is only, and entirely, about the RSPB's *misleading, inaccurate, ambiguous, exaggerated, and omissive* language on their appeal-page. It's not credible that those at the RSPB responsible for the publication of their appeal-page are not intelligent and educated enough to know the precise meaning of the words they use or that they are unaware of the inferences the reader is *clearly likely* to make.

None of the above requires any knowledge or understanding of natural regeneration nor personal knowledge of Abernethy Forest - one need only be alert to the careful-use and careful-misuse of language - to understand the precise meaning of words and to understand what inferences the reader is *clearly likely* to make.

Further - the RSPB appeal-page is fallacious, being littered with examples of the following :

- (ambiguity) by using terms (for example - describing the forest as 'surviving') with more than one meaning, while not clarifying which meaning is intended, the RSPB has committed the *equivocation* fallacy : [http://en.wikipedia.org/wiki/Equivocation\\_fallacy](http://en.wikipedia.org/wiki/Equivocation_fallacy)
- (exaggeration) by misrepresenting the condition of the forest (for example - describing it as 'fragmented') the RSPB has committed the *straw man* fallacy : [http://en.wikipedia.org/wiki/Straw\\_man](http://en.wikipedia.org/wiki/Straw_man)
- (omission) by failing to mention any fact (for example - their own actions to reduce red deer numbers) that might undermine their interventionist position, the RSPB has committed the *cherry picking* fallacy : [http://en.wikipedia.org/wiki/Cherry\\_picking\\_\(fallacy\)](http://en.wikipedia.org/wiki/Cherry_picking_(fallacy))

The other RSPB claims are merely variations of these fallacies. The RSPB appeal-page *is* fallacious whether the RSPB understand that or not ; whether the RSPB acted it with intent or not.

In raising my Stage 1 complaint with the RSPB I paid them the compliment of assuming them to be intelligent and educated enough to understand the validity of my complaint and reasonable enough to accept the possibility that some of the language of their appeal-page could be misleading, inaccurate, ambiguous, exaggerated, and omissive. In return I have received brief, arrogant, patronising, and dismissive responses that finally included a refusal to answer any more of my questions. In his last email

to me, George Campbell, RSPB Regional Director (North Scotland) concluded with "We will no longer be responding to your requests for information".

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The 'upland of Mar' local history and geography project